

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,
Debtor.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)
Chapter 13

**REPLY TO THE ONE HUNDRED NINETY-NINTH OMNIBUS OJECTION
(SUSTATIVE) OF THE COMMONWEALTH OF PUERTO RICO TO
CLAIMS ASSERTED BY HOLDERS OF CERTAIN PRASA SENIOR LIEN BONDS**

TO THE HONORABLE COURT:

COMES NOW creditor **COOPERATIVA DE AHORRO Y CREDITO AGUAS
BUENAS** through its legal representation who respectfully prays:

1. On June 11th, 2020, the Debtor, The Commonwealth of Puerto Rico by and through the Financial Oversight and Management Board for Puerto Rico, as the representative of the Commonwealth filed the One Hundred Ninety-Ninth Omnibus Objection to claim #27571 filed by Cooperativa de A/C Aguas Buenas. (Docket Entry #13407)

2. The objection to the claim was based under the ground that the Commonwealth is not liable of claim for bonds issued by PRASA.

¹The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3841); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case Numbers due to software limitations).

*The Financial Oversight and Management Board for Puerto Rico
PROMESA, Title III
No. 17 BK 3283-LTS
Reply to the One Hundred Ninety-Ninth Omnibus Objection
Page | 2*

3. Creditor herein opposes to the Objection filed and seeks recovery for amounts from which The Commonwealth of Puerto Rico is liable as guarantor of the liability owed by PRASA.

4. The Claim must be allowed under 11 U.S.C. § 502(b)(1) because it is enforceable against Debtor under the Full Faith and Credit clause of the Constitution of The Commonwealth of Puerto Rico and/or The Constitution of the United States of America.

WHEREFORE it's respectfully requested from this Honorable Court that the Proof of Claim #27571 be allowed, and denies Debtor's Objection to such claims.

CERTIFICATE OF SERVICE: I HEREBY CERTIFY that on this same date, I electronically filed the present motion with the Clerk of the Court using CM/ECF System which will send notification to: Mr. Hermann D. Bauer, Esq., and to Mr. Martin J. Bienenstock, Esq., to their respective electronic mail; and **I Hereby Certify** that a copy of this document is sent may regular mail to: Mr. Mr. Hermann D. Bauer, Esq., O'Neill & Borges, LLC, 250 Munoz Rivera Ave., Suite 800, San Juan, Puerto Rico 00918-1813, and to Mr. Martin J. Bienenstock , Proskauer Rose, LLC, Evelyn Times Square, New York, NY 1036.

*The Financial Oversight and Management Board for Puerto Rico
PROMESA, Title III
No. 17 BK 3283-LTS
Reply to the One Hundred Ninety-Ninth Omnibus Objection
Page | 3*

RESPECTFULLY SUBMITTED in Humacao, Puerto Rico, on the 13th day of July
2020.

SANTOS BERRIOS LAW OFFICES LLC
PO BOX 9102
HUMACAO PR 00792-9102
TEL (787)285-1001, FAX (787)285-8358
E-mail: santosberriosbk@gmail.com

/s/JUAN A SANTOS-BERRIOS ESQ
USDC-PR #212506